## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI

JAMES CODY, et al.,	)
Plaintiffs,	)
v.	) Cause No. 4:17-cv-2707
CITY OF SAINT LOUIS, MISSOURI,	)
Defendant	)

## PLAINTIFFS' NOTICE OF EMERGENCY INSPECTION DIRECTED TOWARD CITY OF ST. LOUIS

COME NOW Plaintiffs, by and through undersigned counsel, pursuant to Federal Rule of Civil Procedure 34(a)(2), and hereby request the following inspection on Friday, February 12, 2021 at 1:00 pm:

- Unencumbered access to all areas in which detainees are currently being held at the St.
   Louis City Medium Security Institution, including cells, pods, or solitary confinement holding facilities, including space for private interviews with detainees.
- Make available for inspection and on-site scanning all records or documents containing data regarding the temperature of the housing areas of MSI from November 1, 2020 to present.

Dated: February 11, 2020 ARCHCITY DEFENDERS, INC.

By: /s/ Nathaniel R. Carroll
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and

## **DLA PIPER LLP (US)**

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Attorneys for Plaintiffs

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 11<sup>th</sup> day of February, the undersigned served true and correct copies of the foregoing via email on counsel of record for Defendants.

/s/ Nathaniel R. Carroll